

FILED

JAN 27 2012

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

TERESA WATSON,  
Plaintiff

vs.

Case No. 11-cv-632-MJR-SCW

EAST ST. LOUIS SCHOOL DISTRICT 189,  
GENERAL SERVICE EMPLOYEES LOCAL  
382, KIM HAYWOOD,  
Defendants

ATTACHED AMENDED COMPLAINT

It has been in the news that federal and state authorities have taken over East St. Louis School District 189. One article in the newspaper quoted an official in saying that there would be eye checking and sanity checking of school district officials because of their bad decision making.

On July 22, 2011 I filed my case in federal court and it was assigned case number 11cv-632-MJR-SCW, East St. Louis School District 189 and General Service Employees Local 382 (Kim Haywood) were the defendants. For several months I sporadically visited or called to see if any responses were given to my requests. My last call was on 1-17-12 and I was invited to check back in a couple of weeks and speak with the clerk who works with the judge and was eventually invited to speak at that time and was transferred but she had no information to share. An automatic e-mail dated 1-19-12 and post marked 1-20-12 was mailed to me and I was able to learn of this mail on 1-23-12 and was able to visit the court on this 1-23-12 day. During this 1-23-12 visit I was able to learn of the 1-19-12 memorandum and order. No court hearing, meeting, or any contact was held or initiated to clear up any questions about this case filed on 7-22-11- the granted opportunity to file again instead of a dismissal is appreciated.

My job with East St. Louis School District 189 was still taken from me even after I began asking for help from General Service Employees Local 382. These parties were involved in discrimination against me, I was discriminated against because of my race, religion, (work related hand and foot injuries) or disabilities, I was sexually harassed, and retaliated against. (Abducted, missing, murdered, etc. people are in the news all of the time- even yesterday a plot was in the local news- miraculously nearly a year ago I was freed after being suspicious of being abducted and have resumed having to try to avoid other attempts.)

Trying to avoid unfair courts and court like places, betraying lawyers, sore losers, I took the abuse at work, contacted the union after a hearing was requested by an abuser, attended unwarranted hearings and proved my cases and even blotted out names in one document (exhibit) of a number of defending documents (exhibits) that I prepared, placed a defending document (exhibit) at the seats of some board members during the night that my job was taken, and I prepared a document (exhibit) for the Equal Employment Opportunity Commission. The investigator at EEOC decided to use a personal name in

listing the defendants and in other parts of the charges and right to sue letters.

Some of my exhibits for my case relate to the difficulty in trying to get help from the school district in properly reporting my hand and foot injuries sustained at work, the district refused to give me worker's compensation claim numbers to give as I sought help with my injuries. The EEOC investigator and then their supervisor advised me that they were required by law to type the charge as they did regarding my hand and foot injuries or disabilities- they said they could not identify the injuries or disabilities in the charges or documents.

1. Pauper Status

The 1-19-11 memorandum and order states that my Pro Se status (not having an attorney) is being considered in my being given a chance to amend the 7-22-11 documents- I wish that I was given an attorney to consistently properly represent me and to amend the 7-22-11 documents as advised to avoid the risk of more errors, delays, or denials with or without prejudice.

2. Appointment of Counsel

I have "effectively been precluded" from seeking an attorney"- as asked of in the 1-19-12 memorandum and order. (My financial status and lack of other resources makes me unable to do "all" that is involved in seeking an attorney and hoping to find one to "consistently properly" represent me.

Terminology used in law, allotted time lines, deadlines, maneuvers or filed motions, granted motions, denied motions, recusing judges, withdrawing attorneys, clerks unwilling or unable to give help, etc. and my financial status and lack of other resources makes trying to litigate alone impossible- this relates to the question in the 1-19-12 memorandum and order of would a plaintiff be able to "litigate it himself".

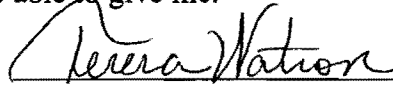
A lack of resources lead to my rushing to complete the 7-22-11 complaint and helped to cause some information to not be included.

3. Service of Process

(Hopefully this will be granted.)

4. Motion to State Court

The document to the state court that I filed in federal court on 10-5-11 was not submitted to be ruled on or denied, the state court would not give me any proof that I submitted this document to them on 10-4-11, the stamp from the federal court gave me some proof that my case was filed in state court before the deadline arrived. I was permitted by EEOC to file both of my cases in federal and state court. Also, the state court has given it some proper attention- and at times, like initially they act confused about the process. As in the 1-19-12 memorandum I was not asking the state court to take sides or anything in that manner, I only asked for any and all assistance that they were able to give me.

  
Teresa Watson

1-27-12  
Date

UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

Teresa Watson

Plaintiff(s)

East St. Louis School District 189

Defendant(s)

General Service Employees Local 382  
(Kim Haywood)

Case Number:

11-cv-632-MJR-SCW  
(To be supplied by Clerk's Office)

**EMPLOYMENT  
DISCRIMINATION COMPLAINT**

Plaintiff brings a complaint against East St. Louis School District 189.  
[defendant(s)] for discrimination as set forth below. General Service Employees Local 382 (Kim Haywood)

Plaintiff ☐ DOES ☐ DOES NOT demand a jury trial.

**I. PARTIES**

Name and Address of Plaintiff:

Teresa Watson  
P.O. Box 24293  
Belleville, IL 62223

Name and Address of Defendant(s):

East St. Louis  
School District 189  
1005 State Street  
East St. Louis, IL 62201

General Service  
Employees Local 382  
P.O. Box 6407  
East St. Louis, IL  
62201

The plaintiff was:

☐ denied employment by the defendant(s).

☐ hired and is still employed by the defendant(s).

☒ employed but is no longer employed by the defendant(s).

*E. St. Louis School Dist.*  
*\* Watson was a paying member of General Svc. Employees Local 382.*  
The alleged discrimination began on or about: 9-11-09 (give month, day, and year). (5-09 district) (union) EEOC doc.

## II. JURISDICTION

1. Jurisdiction over this claim is based on 28 U.S.C. § 1331. Plaintiff alleges that the defendant(s) discriminated against Plaintiff because of Plaintiff's:

☒ **Sex** (Title VII of the Civil Rights Act of 1967, as amended, 42 U.S.C. § 2000e-5)

☒ **Race** (Title VII of the Civil Rights Act of 1967, as amended, 42 U.S.C. § 2000e-5, and/or 42 U.S.C. § 1981)

☐ **Age** (The Age Discrimination in Employment Act, 29 U.S.C. § 621)

☒ **Disability** (The Americans with Disabilities Act, 42 U.S.C. § 12101 and/or The Rehabilitation Act, 29 U.S.C. § 701)

☐ **National Origin** (Title VII of the Civil Rights Act of 1967, as amended, 42 U.S.C. § 2000e-5)

☒ **Religion** (Title VII of the Civil Rights Act of 1967, as amended, 42 U.S.C. § 2000e-5)

☒ **Other** (list): retaliation

2. Plaintiff ☒ Has ☐ Has Not filed a charge before the United States Equal Employment Opportunity Commission (EEOC) relating to this claim of employment discrimination. [Attach a copy of charge to this complaint].

Plaintiff ☐ Has ☒ Has Not filed a charge before the Illinois Department of Human Rights relating to this claim of employment discrimination. [Attach a copy of charge to this complaint].

3. Plaintiff's Right to Sue Notice from the EEOC was received on or about 7-14-11 (date). [Attach a copy of Notice of Right to Sue to this complaint].

### III. STATEMENT OF LEGAL CLAIM

Plaintiff is entitled to relief in this action because: My job was wrongly taken from me.

I began asking for assistance of General Service Local 382 in my sub-  
jection to sexual harassment in the workplace and actions on the part  
of my employer that were discriminatory based on my race, reli-  
gion, and disability (hurt hand and foot at work). I asked for  
help several times by phone and certified mail and was ignored.  
I have been discriminated against based on my race, religion, sexual-  
ly harassed and subjected to retaliation (Title VII of the Civil  
Rights Act of 1964 as amended). - Continued Below -

### IV. FACTS IN SUPPORT OF CLAIM

State here briefly and clearly as possible the essential facts of your claim. Take time to  
organize your statement. You may use numbered paragraphs if you find it helpful. Describe  
precisely how each defendant in this action is involved. Give dates and places. Concentrate on  
describing as clearly and simply as possible the employment practice you allege to be illegal and  
how it discriminated against you. It is not necessary to make legal arguments or cite any cases or  
statutes. In most circumstances, this only makes your claim difficult to understand. As much as  
possible, let the facts speak for themselves.

See above (and continuation below). (Also because I  
would not continue submitting to the abusive request  
my job was taken from me.)

Continued

### III. Statement Of Legal Claim

My last supervisor was Donna Cameron I was placed on in-  
voluntary leaves twice, my transfer requests were denied  
(ignored). I was discriminated against based on my race,  
religion - and was sexually harassed and retaliated against  
(Title VII of the Civil Rights Act of 1964 as amended.)

I was discriminated against based on my race and religion and  
subjected to sexual harassment by both my peers and supervisors.  
I was placed on involuntary leave on two occasions, my transfer  
requests were denied (ignored). My complaints of harassment  
were never investigated and/or resolved and I was sub-  
jected to retaliation for complaining, (Retroactively) on 5-3-10  
my employment was terminated. I have been discriminated  
(Rev. 4/1010) against based on my race (African American), my religion (Christian),  
sexually harassed and subjected to retaliation, for complaining  
in violation of Title VII of the Civil Rights Act of 1964, as amended.

## V. RELIEF YOU REQUEST

Based on the foregoing, Plaintiff seeks the following relief: (check below what you want the court to do for you – make as many checks as you like, and use additional sheets, if necessary).

- ☒ An award of back pay
- ☒ Reinstatement to Plaintiff's old position
- ☒ Costs of suit (but not attorney fees)
- ☒ An award of money damages
- ☒ Other (explain below)

Any and all awards to make me whole that will be just and proper and ordered by the court(s).

Signed on: 1-27-12  
(date)

P.O. Box 24293  
Street Address

Belleville, IL 62223  
City, State, Zip

Teresa Watson  
Signature of Petitioner

Teresa Watson  
Printed Name

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Signature of Attorney (if any)